UNITED STATES DISTRICT COURT WESTERN DISTRICT OF VIRGINIA ABINGDON

| UNITED STATES OF AMERICA |) | |
|--|---|------------------------|
| |) | |
| V. |) | |
| |) | Case No. 1:19-CR-00016 |
| INDIVIOR INC. (a/k/a Reckitt Benckiser |) | |
| Pharmaceuticals Inc.) and |) | |
| INDIVIOR PLC |) | |

MOTION TO SEAL

The United States of America ("United States") hereby moves for an order sealing its

Application for a Post-Indictment Protective Order ("Application") and proposed First Protective

Order ("Proposed Protective Order") (both submitted to the Court this same day) until further

order of the Court, because they reflect bank account numbers.

The United States further requests that the Court enter the Proposed Protective Order under seal, because it reflects bank account numbers, but with a carve-out authorizing the United States to share the sealed order with the banks where the accounts reside, thereby enabling the banks to see the account numbers.

If this Motion to Seal is granted, the United States will file redacted versions of the Application and Proposed Protective Order on the public docket.

Respectfully submitted,

DANIEL P. BUBAR

First Assistant United States Attorney Attorney for the United States, Acting Under Authority Conferred by 28 U.S.C. § 515

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CERTIFICATE OF SERVICE

I certify that on January 29, 2020, I electronically filed the foregoing Motion to Seal with the Clerk of Court via the CM/ECF system, which will send notification of the filing to all counsel of record in this matter.

/s/ Albert P. Mayer, VSB No. 86024